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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS IGOIN;  
LAURENCE APFELBAUM, individually and in her  
capacities as executor and beneficiary of the Estate  
(Succession) of Doris Igoi; and EMILIE  
APFELBAUM,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04336 (SMB)

**DECLARATION OF ONA T. WANG IN SUPPORT OF TRUSTEE'S  
STATEMENT OF MATERIAL JURISDICTIONAL FACTS**

1. I am a partner at the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, Trustee (the “Trustee”) for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff.

2. As an attorney of record, I am fully familiar with this case and the facts set forth herein. I have personal knowledge of the matters stated in this Declaration.

3. Attached hereto as Exhibit A is a copy of the unofficial transcript of the oral argument before this court on August 6, 2014 regarding the Defendants’ motion to dismiss.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: New York, New York  
August 20, 2014

/s/ Ona T. Wang  
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